

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION

In the Matter of the Petition

of

GRACE OCEAN PRIVATE LIMITED, as  
Owner of the M/V DALI,

and

SYNERGY MARINE PTE LTD, as Manager  
of the M/V DALI,

for Exoneration from or Limitation of  
Liability

Civ. No. 24-00941-JKB

***IN ADMIRALTY***

**[PETITIONERS' PROPOSED] SCHEDULING ORDER**

Petitioners and Claimants (hereinafter the “Parties”), having come before this Court at the Status Conference held on October 29, 2024, it is hereby **ORDERED** and **ADJUDGED** that the following scheduling order deadlines shall apply in this matter:

1. This case is hereby bifurcated into two phases for trial. During phase one, the Court will resolve questions of exoneration, fault and limitation of liability. During phase two, if necessary, the Court will resolve questions as to any individual Claimant’s damages. The following deadlines pertain only to preliminary motions practice and phase one of the litigation, after the conclusion of which the Court will set further deadlines associated with phase two. Only after completion of a trial on phase one does the Court anticipate setting deadlines relating to phase two discovery and litigation. *Id.* at 2-3. In the meantime, however, fact discovery with respect to issues to be tried in phase two shall proceed.

2. This is an action in which Fed. R. Civ. P. 26(a)(1) disclosures need not be made.
3. **PRE-DISCOVERY MOTIONS** shall be filed by December 20, 2024. Response briefs shall be due January 20, 2025. Reply briefs shall be due February 3, 2025.
4. **FACT DISCOVERY** shall commence immediately and shall be completed by December 31, 2025.
5. **EXPERT DISCLOSURES** by the Claimants shall be made by January 30, 2026.
6. **EXPERT DISCLOSURES** by the Petitioners shall be made by March 30, 2026.
7. **REBUTTAL DISCLOSURES** by the Claimants shall be made by April 30, 2026.
8. **EXPERT DEPOSITIONS** and any remaining expert discovery including all supplemental reports shall be completed by July 31, 2026.
9. **DISPOSITIVE MOTIONS** shall be filed by October 16, 2026.
10. **JOINT PRE-TRIAL ORDER**, including witness and exhibit lists, deposition designations, objections to exhibits and designations, proposed findings of fact, proposed conclusions of law and identification and proposed briefing schedule for any anticipated motions *in limine* shall be filed by November 20, 2026.
11. **TRIAL** on the phase one issues shall commence on January 18, 2027, and be anticipated to last 15 trial days. All counsel entered of record in this matter are hereby attached for trial during that time.

To ensure the efficient handling of this complex case, the following additional requirements are being set by the Court:

1. All counsel should hold every Tuesday and Wednesday during 2025 (holidays excepted) for depositions of fact witnesses in this matter. If lead counsel for any party is unable to attend the deposition, they are expected to find coverage.

2. All counsel should hold every Tuesday and Wednesday from June 1, 2026, through September 1, 2026, for depositions of expert witnesses in this matter. If lead counsel for any party is unable to attend the deposition, they are expected to find coverage.
3. If necessary, counsel shall use reasonable efforts to double track depositions, where appropriate, during the time period for depositions designated in Paragraphs 2 and 3 above. Furthermore, the requirements of Paragraphs 2 and 3 above are not intended to preclude the taking of depositions on another day where appropriate.
4. All depositions shall take place in person, with a link made available for participation via videoconference for parties desiring to do so, except that a deposition may take place fully remotely upon agreement by the noticing and defending parties or by order of the Court.
5. In order to ensure the smooth management of depositions, the noticing party and the defending party shall be limited to three attorneys attending in person, and each of the panels identified in the Joint Status Report shall be limited to one attorney attending in person. All depositions shall, where feasible, be set up so that any other counsel may attend by video. The examining parties shall agree among themselves how to divide their time so that the deposition does not exceed seven hours. Any redirect and re-cross shall not count towards the seven-hour requirement, but any re-cross shall be limited to the scope of the re-direct examination.

6. As the parties previously have agreed, the Court hereby Orders that Petitioners shall produce the former crew of the M/V DALI who have been repatriated to India or elsewhere to appear for depositions in London or elsewhere by written agreement.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

BY THE COURT:

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James K. Bredar  
United States District Judge